

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**B.P., H.A., and S.H., individually,
and on behalf of all others similarly
situated**

Plaintiffs,

v.

**City of Johnson City, Tennessee, et
al.,**

Defendants.

No. 2:23-cv-00071-TRM-JEM

**DEFENDANTS' JOINT RESPONSE TO PLAINTIFFS'
MOTION TO DEPOSE SEAN WILLIAMS AND TO HAVE
DEPOSITION TIME SPLIT EQUALLY BETWEEN THE PARTIES**

The Defendants, the City of Johnson City, Turner, Legault and Sparks ("Defendants"), jointly respond to Plaintiffs' Motion to Depose Sean Williams, who is currently in the custody of federal law enforcement.

On October 4, 2024, Plaintiffs filed their motion to depose Sean Williams ("Williams"), and in support of their motion, Plaintiffs' counsel, Vaness Baehr Jones, filed a declaration indicating that she had met and conferred with counsel for Defendants regarding this deposition previously in April of 2024. (D.E. No. 370 and 371). When the issue was first addressed last spring, Defendants suggested that the deposition for Williams should wait until after the completion of his criminal proceeding, which at that time was set for August 2024. Plaintiffs never filed the motion to depose, and there was never any further discussion regarding the motion.

Plaintiffs' counsel never again reached out to defense counsel before filing their

October 4th motion to depose Williams. If Plaintiffs' counsel had contacted defense counsel before filing this motion, defense counsel would have agreed to the motion to depose Williams, as his criminal trial has now been continued and discovery deadlines are approaching in the civil litigation¹.

Thus, Defendants do not oppose Plaintiffs' Motion to Depose Sean Williams. However, Defendants do request that each side be provided an equal amount of time to depose Williams if this motion is granted.

Respectfully submitted,

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¹ Although Defendants do not oppose Plaintiffs' Motion to Depose Sean Williams, Defendants certainly deny the factual allegations set forth in the motion regarding any alleged corruption on the part of these Defendants.

/s/ Emily C. Taylor

Emily C. Taylor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 10th day of October 2024, a true and correct copy of the foregoing has been forwarded via the Court's electronic notification system to:

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